

FDD-PST

From: Farneti, Christine H. [cfarneti@mail.volusia.k12.fl.us]
Sent: Tuesday, April 04, 2000 9:36 AM
To: 'Director, Food Distribution Division'
Subject: CORE

I am a school food service director for a 65-school district with 60,000 students in central Florida. Florida is one of the leading agricultural states and we want to provide the best meals to students at the lowest possible price, made possible in part by the USDA commodity program. I question the basis of the CORE findings and the resulting proposal from

USDA. I understand that this process began as a result of a letter from 19

school districts in Colorado.

The CORE findings and the proposal call for radical changes and a major departure from the system as we know it now, all based on perceived problems. None of the discussion, findings or proposals are based on a comprehensive evaluation of the program.

While it is true that the commodity program could be more effective, the underlying problem that I see is communication and lack of knowledge.

When

a state agency is knowledgeable about the commodity program, and when they

effectively communicate that information to recipient agencies, the commodity program runs smoothly. Without good communication, the commodity

program will continue to suffer, regardless of the purchasing, ordering or

distribution system.

The commodity program is extremely complex. One can not learn this program

overnight. It isn't that state officials do not want to do a good job, but

they do not always have the knowledge to manage this program.

I think the greatest improvement in this program would be intensive training

program for state, regional, and national staff in the details of the program, to include on-site observations of excellent operations.

We do not need to develop new standards of performance for this program.

We

have them as outlined in 7 CFR 250.

To address specific provisions:

Number 3 - Update product specifications

I agree that there may be some cost benefit for converting specifications to

those of industry. This should done with care to ensure that the industry

specifications are equal to or better than the current specifications.

We do

not want reduced standards.

Number 4 - Allow vendors to use commercial labels

I strongly disagree with this proposal. Current federal and state audit standards and regulations require full accountability for commodity products. Commercial labels lead to confusion. When are unable to identify

commodities, we cannot comply with the regulations.

This problem will not be solved by someone at the local level marking each

package as it comes in. I can tell you from experience, that this will not

consistently happen. It will be a very labor-intensive burden that could be

avoided.

I am also concerned about this issue as it relates to disaster feeding.

If

we can not distinguish between our purchased foods and our commodities,

we lose our ability to provide these much needed foods in times of disaster.

Number 6 - Expand full substitutability of commodity product
This is unacceptable, not only because of the paperwork or difficulty of implementation, but for the safety and quality of our food supply. The current level and standards for inspection and grading service ensures that we get what we pay for and that it is manufactured with the specified ingredients and under the safest procedures. We can not afford this provision. The risks to our food supply and the possible quality issues are too great to warrant the benefits of this proposal.

Number 7 - Work with States to test the seamless commodity distribution concept
When we move into this area, the Food Distribution program quickly changes to a cash-in-lieu of commodity program. I am very concerned that the Department is supporting a cash out program. How we will continue to maintain our link to agriculture?

Number 8 - Facilitate the processing of commodities with limited demand
I encourage the department to seek ways to further process commodities that are difficult to use. At the same time, the acceptance of difficult-to-use products would be significantly enhanced, at a minimal cost, by providing "Commodity Fact Sheets" and nutrition information at the time of purchase and requiring the industry to provide suggested realistic preparation methods and recipes.

We sometimes receive commodities without the fact sheets and/or without the contribution to the meal pattern. Those of us using the food-based menu planning systems, have difficulty using commodities that do not indicate the contribution the meal pattern. Recipient agencies in Florida fill out an acceptance survey that I hope is used to determine what will be ordered for Florida.

My district has found a balance between site-based preparation and prepared foods that builds good participation in our schools. We rely on the commodities to assist us in providing these "homemade" items.

Number 12 - Provide computer connectivity to the school level
I think this is a very ambitious idea on the part of USDA. I question the effectiveness of USDA by-passing state and district levels to communicate directly with the schools. In Florida all school districts have district food service offices. Such a move is reminiscent of when Ellen Haas tried to bypass the state and district offices and communicate directly with the schools. It DID NOT work. As with Team Nutrition, often individual schools do not take advantage the things available because they are too busy feeding children to take a lot of notice of other things. District offices, on the other hand are geared for this communication and we rely on the state to act as a clearing house for us and keeps the districts updated and informed.

Number 15 - Other Improvements
One of the other improvements listed was to encourage cooperatives for procurement. This particular area is not a part of the Food Distribution program and any proposal for change in this area is more appropriately included in the School Nutrition Programs area.

I appreciate the opportunity to review and comment on these proposed changes. I would also like to request a copy of any tabulation of the comments that is produced as a result of this comment period.

Sincerely,

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